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2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 -----X
5 GOVERNMENT EMPLOYEES INSURANCE COMPANY,
6 GEICO INDEMNITY COMPANY, GEICO GENERAL
7 INSURANCE COMPANY, and GEICO CASUALTY COMPANY,
8 Plaintiffs,

9 -against-

Case No.:
1:20-CV-03495-FB-SJB

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11
12 ALEXANDR ZAITSEV, M.D., METROPOLITAN
13 INTERVENTIONAL MEDICAL SERVICES, P.C.,
14 ANTHONY BENEVENGA, CHARLES G. NICOLA, D.C.,
15 RIDGEWOOD DIAGNOSTIC LABORATORY, L.L.C.,
16 TRI-STATE MULTI-SPECIALTY MEDICAL SERVICES, P.C.,
17 RIVERSIDE MEDICAL SERVICES, P.C., KRISTAPPA
18 SANGAVARAM, M.D., ALLAN WEISSMAN, M.D.,
19 EUGENE GORMAN, M.D., BOGDAN NEGREA, M.D.,
20 ANTONIO CICCONE, D.O., STELLA AMANZE, P.A.,
21 FRIDA ISAKOV, P.A., LUCKNIE OVINCY, P.A.,
22 EMILY BAKERMAN, N.P., MELISSA EVANS, N.P.,
23 MINI MATHEW, N.P., ANGELA PULLOCK, N.P.,
24 LINDA SANTA MARIA, N.P., RIVKA WEISS, N.P.,
25 CROSSTOWN MEDICAL, P.C.,
and WILLIAM FOCAZIO, M.D.

Defendants.

-----X
October 20, 2021
10:08 a.m.

EXAMINATION BEFORE TRIAL OF
DANIEL KANDHOROV.

1 D. KANDHOROV

2 A I don't recall that. I don't
3 remember.

4 Q Who would know the answer to
5 that question?

6 A Dr. Zaitsev's accountant,
7 Mark.

8 Q Let's take a look at the next
9 transaction that I've highlighted. We
10 are on Exhibit 8, Page 2. We are in the
11 middle of the page. You see the
12 transaction that's June 18th, online
13 transfer to checking 1858? Do you see
14 that?

15 A Yes, I do see that.

16 Q And you see that this one is
17 for \$10,000?

18 A That is right.

19 Q Do you know what that
20 transaction is for?

21 A I don't recall.

22 MR. HENESY: Let's mark this as
23 Exhibit 10. I will represent Exhibit
24 10 is a one-page PDF entitled,
25 Business Signature Card.

1 D. KANDHOROV

2 (Whereupon, Exhibit 10
3 was marked for
4 identification.)

5 Q Can you see that it says
6 "Business Signature Card" at the top,
7 sir?

8 A Sure. Yes.

9 Q Then on the right-hand side of
10 the account number is the account that
11 ends in that 1858 that we just saw,
12 right?

13 A Yes.

14 Q Then we go to the left and we
15 see that this account is in the name of a
16 company called 2598 3rd Avenue, Inc. Can
17 you see that?

18 A Yes, I do.

19 Q Are you familiar with a
20 company called 2598 3rd Avenue, Inc.?

21 A No.

22 Q Do you have any idea why
23 Financial Vision Group I would transfer
24 \$10,000 to a company called 2598 3rd
25 Avenue, Inc.?

1

D. KANDHOROV

2

A I don't remember.

3

Q You don't remember or you

4

don't know?

5

A No. I don't know. Probably

6

Zaitsev and Kaminar knows.

7

Q If we go down to this line

8

here, do you see where it says Lyubov

9

Gatilova, and you see that it says

10

president?

11

A Yes, I see that.

12

Q Do you know that person?

13

A No.

14

Q Do you know that person to be

15

Dr. Zaitsev's mother-in-law?

16

A I don't know.

17

Q Would it surprise you to know

18

that it's Dr. Zaitsev's mother-in-law?

19

A If you say, yes.

20

Q Do you have any idea why --

21

A I am surprised, yes.

22

Q Do you have any idea why

23

Financial Vision Group I would transfer

24

\$10,000 to Dr. Zaitsev's mother-in-law?

25

A Probably we were funding

1 D. KANDHOROV

2 Probably. I believe so. Yes.

3 Q You would expect there to be
4 documentation concerning an advance
5 payment made to Dr. Zaitsev's
6 mother-in-law, right?

7 A Could be verbal, too, because
8 this is Dr. Zaitsev. He is one of the
9 partners of the company. It could be
10 verbal, too. I don't recall. I don't
11 remember.

12 Q Did Dr. Zaitsev seek
13 permission from anyone at Financial
14 Vision Group I to transfer \$10,000 to an
15 account held by his mother-in-law?

16 A Probably he asked permission,
17 of course.

18 Q Who would he ask permission
19 from?

20 A From the member.

21 Q Which member?

22 A Members of the company,
23 Financial Vision I.

24 Q Would he have asked you?

25 A Specifically no, but members,

1 D. KANDHOROV

2 yes, all of us.

3 Q Would Dr. Zaitsev have been
4 permitted to transfer \$10,000 to an
5 account held in his mother-in-law's name
6 without permission from the other members
7 of Financial Vision Group I?

8 A I don't think so. No.

9 Q Let's go back to Exhibit 8.
10 We are on the last section here. This is
11 June 25th online transfer to checking
12 8127. Do you see that?

13 A Yes, I do.

14 Q This is for \$8,000. Do you
15 see that?

16 A Yes, I do.

17 Q What was that transfer for?

18 A I don't remember.

19 MR. HENESY: Let's take a look at
20 Exhibit 11. Exhibit 11 is a one-page
21 PDF that says, "Business Signature
22 Card."

23 (Whereupon, Exhibit 11
24 was marked for
25 identification.)